

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Implement the
Commission; Procurement Incentive Framework and to
Examine the Integration of Greenhouse Gas Emissions
Standard into Procurement Policies.

Rulemaking 06-04-009
(Filed April 13, 2006)

**PREHEARING CONFERENCE STATEMENT
OF WILD GOOSE STORAGE, LLC**

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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement the
Commission's Procurement Incentive Framework and to
Examine the Integration of Greenhouse Gas Emissions
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Rulemaking 06-04-009
(Filed April 13, 2006)

**PREHEARING CONFERENCE STATEMENT
OF WILD GOOSE STORAGE, LLC**

In accord with the July 12, 2007 Administrative Law Judges' Ruling in the above captioned proceeding ("July 12 Ruling"), Wild Goose Storage, LLC, hereby submits this prehearing conference statement addressing the natural gas inquiry phase of the Commission's Rulemaking regarding greenhouse gas ("GHG") emissions. As defined in the July 12 ruling, "the natural gas inquiry in Phase 2 will address GHG emissions associated with (1) combustion of natural gas by non-electricity generation and end-use customers, and (2) all transmission, distribution and storage of natural gas within California.

I. WILD GOOSE'S INTEREST IN THE PROCEEDING

Wild Goose is an independent natural gas storage service provider, receiving its certificate of public convenience and necessity from the Commission in June 1997.¹ At that time, Wild Goose became authorized to provide firm and interruptible storage services from storage facilities to be constructed in Butte County, California and interconnected to PG&E's Line 167 Sacramento Valley Local Transmission System. Wild Goose commenced service from that facility in April 1999. In July 2002, Wild Goose received Commission authorization to expand the size of its storage facility from the then current 14 Bcf inventory capacity (with a

¹ See Commission Decision 97-06-091.

concomitant injection capacity of 80 MMcf/d and withdrawal capacity of 200 MMcf/d) to 29 Bcf inventory capacity (with a concomitant injection capacity of 450 MMcf/d and withdrawal capacity of 700 MMcf/d), and to construct approximately 25 miles of pipeline to interconnect its facility to the PG&E Line 400 backbone transmission system.²

As a natural gas storage service provider in California, Wild Goose is regulated by the California Public Utilities Commission and, as a result, is a named respondent in this proceeding.³ Accordingly, Wild Goose will be directly impacted by any regulations adopted by the Commission to address GHG emissions, as well as any comparable regulations which will be adopted by the California Air Resources Board.

II. COMMENTS ON STAFF RECOMMENDATIONS

Appended to the July 12 Ruling is a Report denoting “Preliminary Staff Recommendations for Treatment of Natural Gas Sector Greenhouse Gas Emissions” (“Staff Report”). The July 12 Ruling invites parties to comment on these preliminary recommendations. As summarized in the July 12 Ruling, those recommendations are as follows.

1. If a cap and trade regime is established for the California economy, the natural gas sector should be a capped sector.⁴
 - a. Emissions from a smaller natural gas end-user should be regulated at the distribution utility level with a natural gas sector cap. Whereas larger natural gas end-users should be regulated as point sources and not as part of the natural gas sector.
 - b. Electric generation natural gas customers should be treated as part of the electric sector, not the natural gas sector.
 - c. Emissions from transportation related uses of natural gas should be addressed by

² See Commission Decision 02-07-036.

³ See Decision 07-05-059, Second Order Amending Order Instituting Rulemaking, R. 06-04-009 (May 24, 2007) p. 12, Ordering Paragraph 4 (making Wild Goose a respondent to the proceeding).

⁴ Note that Staff has specifically recommended that natural gas-related emissions should be capped. See Staff Report at p. 2

ARB as part of the transportation sector, not the natural gas sector.

- d. Emissions associated with the transmission, distribution, and storage of natural gas for all end users should be regulated within the natural gas sector cap.
2. In Phase 2, policy issues regarding the framework for GHG emission regulation for the natural gas sector (such as described above) would be handled separately from the electricity sector issues.
3. Phase 2 would not consider GHG emissions reporting and tracking or 1990 baseline emissions for the natural gas sector, with those issues to be addressed instead through ARB processes.
4. Staff would issue a data request to obtain natural gas entities current emission data.
5. Electricity and natural gas sector inquiries in Phase 2 would be combined regarding emission reduction measures, annual sector emission caps, flexible compliance mechanisms and entity specific allowance allocations.

As explained below, Wild Goose's primary concern with certain of these recommendations is that given the progress which has already been made by the Commission and parties to this proceeding with respect to a number of the GHG issues vis-à-vis the electricity sector, deliberations on comparable issues for the natural gas sector may not have a reasonable chance to be properly deliberated and/or may be unduly influenced by previously made determinations for the electricity sector.

For example, Staff recommends that GHG emissions from the natural gas sector be capped. Such recommendation relies primarily on the work previously done by the Commission in reaching its determination in Decision 06-02-032 that a load based cap was the preferred mechanism to control GHG emissions associated with the electric sector.⁵ Wild Goose is not opining at this point as to what it believes is the best approach, it would only submit that the Commission undertake a comparable analysis for the natural gas sector given the variances

⁵ See Staff Report at p. 13

between the industries⁶

A broader indication of Wild Goose's concern can be found in the July 13, 2007, Revised Schedule for this proceeding which was issued by Commission's Director of Strategic Planning and Project Manager for this Docket. The schedule indicates that several of the inquiries which the above recommendations indicate would be combined for the natural gas and electricity sectors have already commenced without input from the natural gas sector. For example, recommendation no. 5 indicates that flexible compliance mechanisms would be a matter of joint inquiry. However, the July 13 schedule indicates that a workshop to identify issues and review the electricity sector's flexible compliance regimes in other jurisdictions was held on April 20th, with a straw staff proposal recommending flexible compliance mechanisms to be available in the electricity sector to be issued on September 14th. Wild Goose thus questions when the issues surrounding the natural gas sector flexible compliance mechanisms are to be vetted. Similarly, the July 13 schedule indicates that a Staff preliminary paper on emission reduction measures for the electric sector is to be released on August 2, with comments due on September 6. If, as set forth in the Staff's recommendations for the treatment of GHG emissions from the natural gas sector, the issue of emissions reduction measures is to be a joint inquiry for both the natural gas and electric sectors, Wild Goose queries how and or when Staff is going to consider emission reduction measures for the natural gas sector. Finally, Wild Goose would note that a workshop has already been held to discuss entity specific allowance allocations, another topic which Staff recommends for joint inquiry. As indicated in a July 25, 2007 e-mail from this docket's project manner, a ruling is anticipated on August 1, 2007 requesting comments on entity specific

⁶ As noted in the Staff Report, at p. 7, The natural gas sector accounts for less than 14% of the states GHG emission, with the transmission, distribution and storage of natural gas account for less than ¼ of one percent.

allocations. It is unclear to Wild Goose as to whether the Commission anticipates that the natural gas sector will participate in that round of comments.

In a similar vein, Wild Goose notes that Staff recommendation no. 2 above, would leave the issue of GHG emissions reporting for the natural gas sector to be addressed entirely through the ARB processes. In contrast, with respect to the electricity sector, Staff issued a straw proposal in mid June, after workshops were held at both the Commission and ARB (with documentation and suggestions by parties), with comments submitted earlier this month. As indicated in the June 12, 2007 Administrative Law Judges' Ruling accompanying the release of the straw proposal, a proposed decision on the issue is scheduled to be released in mid-August. The ruling indicated, however, that:

*Because ARB plans to finalize its own staff report on reporting requirements in October 2007, we expect that the usual comment period for proposed decisions will be shortened, so that the Public Utilities Commission can consider the proposed decision at its September 6, 2007 meeting.*⁷

Wild Goose is aware that ARB is under a statutory mandate to adopt regulations to require the reporting and verification of GHG emissions by January 1, 2008, thus driving the need to finalize its own staff report on the issue in October. Given this time frame, Wild Goose is concerned about how the reporting requirements for the natural gas sector will be derived and what input the industry will have.

III. COMMENTS ON PRELIMINARY SCHEDULE

As noted in the July 12 Ruling, in Decision 07-05-029, the Commission established a preliminary schedule for development of guidelines regarding GHG emissions policies for the natural gas sector. The ruling seeks suggested modifications to that schedule. In this regard,

⁷ Administrative Law Judges' Ruling Regarding Comments on Staff Reporting Proposal, R. 06-04-009 (June 12, 2007) at p.4

Wild Goose would note that the schedule set forth in D. 07-05-029 is very vague, rendering it unclear as to when certain issues are to be considered. As discussed above, a detailed schedule was released in this docket on July 13. It is unclear how or if consideration of the natural gas sector issues would fit into this schedule.

The transmittal accompanying the July 13 schedule provided that the Commission is considering the issuance of a proposed decision in late December (in lieu of a previously planned Staff Report) which will include, among other things, recommendations on entity specific allowance allocations, emissions reduction measures, flexible compliance plans, and baseline development. Again, Wild Goose questions the possibility of being able to have careful deliberations of all the identified issues as they relate to the natural gas sector in this limited timeframe.

The July 12 Ruling queried parties as to their opinions about the priority assigned to different issues. For Wild Goose the issue of primary importance in this proceeding is entity specific allowance allocations. Specifically, Wild Goose is concerned as to the extent which any such allocations will impact its ability to build out its current storage facility to its certificated level of 29 Bcf, or to effect any additional expansions of that facility in the future. Similarly, Wild Goose is concerned with the impact which any entity specific allocations could have on any future procurements of new or existing storage facilities in California. The Commission must afford adequate time to consider these issues vis-à-vis the potential impact on the enhancement of natural gas infrastructure in the state.

IV. CONCLUSION

As the Commission advances with its inquiry into GHG issues, Wild Goose would request that these issues, as they relate to the natural gas sector, be fully vetted rather than

relying on previous determinations made vis-à-vis the electric sector or on work product which has not received the input of the natural gas industry.

Respectfully submitted,

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By /s/ Jeanne B. Armstrong
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July 26, 2007

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CERTIFICATE OF SERVICE

I, Melinda LaJaunie, certify that I have on this 26th day of July 2007 caused a copy of the foregoing **PREHEARING CONFERENCE STATEMENT OF WILD GOOSE STORAGE, LLC; R.06-04-009** to be served by electronic e-mail, on all parties to this proceeding and to the parties below by Hand Delivery.

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I declare under penalty of perjury that the foregoing is true and correct.

Executed this 26th day of July 2007 at San Francisco, California.

/s/Melinda LaJaunie
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